

CHRISTOPHER RUSANOWSKY,

Plaintiff,

v.

CITY OF DALLAS and SGT.
ROGER A. RUDLOFF, individually
and in his official capacity as a Dallas
Police Department Police Officer,

Defendants.

Plaintiff Christopher Rusanowsky submits this response to Defendant City of Dallas's Motion for Summary Judgment. Dkt. 70.

Defendant City of Dallas seeks dismissal of Plaintiff's remaining municipal liability claim.

Dkt. 70. The City argues that the Court's dismissal of Plaintiff's constitutional claims against Defendant Sgt. Roger A. Rudloff leave no predicate constitutional violation upon which the City can be held liable. Dkt. 71. As explained further in the accompanying Brief in Response, Plaintiff does not contest the City's very narrow argument that applicable precedent appears to compel this conclusion. Plaintiff further notes that if he successfully revives any or all of his claims against Sgt. Rudloff on appeal, that he would also be entitled to press anew his municipal liability claims against the City.

Dated: April 15, 2024

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Peter B. Steffensen

Peter B. Steffensen